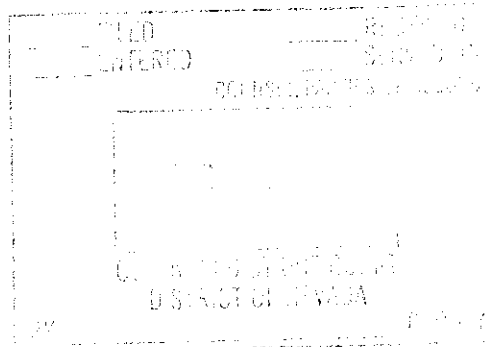




**SEALED**

U. S. Department of Justice  
*United States Attorney*  
*District of Nevada*  
333 Las Vegas Blvd., S., Suite 5000  
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Chief, Organized Crime Strike Force  
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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

**-oOo-**

UNITED STATES OF AMERICA,  
  
PLAINTIFF,  
  
VS.

TERRY J. ARMSTEAD,  
DENISE DORSEY,  
a.k.a. Jozee Riley,  
DENISE SPRATLEY,  
NANCY FLEMING, and,  
NAOMI BROUSSARD,

DEFENDANTS.

SUPERSEDING CRIMINAL INDICTMENT

2:05-CR-00329-KJD(LRL)

VIOLATION:

18 U.S.C. § 371 - Conspiracy to Commit  
Bank Fraud, and to Make, Utter and Pass  
Counterfeit Securities  
18 U.S.C. § 1344 - Bank Fraud  
18 U.S.C. § 2 - Aiding and Abetting

**THE GRAND JURY CHARGES THAT:**

**COUNT ONE**

Conspiracy to Commit Bank Fraud, and  
to Make, Utter and Pass Counterfeit Securities

1. From a date unknown but not later than on or about January 12, 2005,  
to on or about August 3, 2005, in the State and Federal District of Nevada and elsewhere,

**TERRY J. ARMSTEAD,  
DENISE DORSEY, a.k.a. JOZEE RILEY,  
DENISE SPRATLEY,  
NANCY FLEMING, and  
NAOMI BROUSSARD,**

defendants herein, and other persons known and unknown to the Grand Jury, did knowingly,

1 willfully, and unlawfully agree, confederate, and conspire together and with each other to  
2 commit Bank Fraud, in violation of Title 18, United States Code, Section 1344, and to Make,  
3 Utter and Pass Counterfeit Securities, in violation of Title 18, United States Code, Section  
4 513(a).

5 Objective of the Conspiracy

6           2. The principal objective of the conspiracy was to create counterfeit  
7 securities, that is checks, which the defendants and their co-conspirators possessed and  
8 passed to obtain funds from Bank of America corporate bank account holders in order to  
9 obtain by means of fraud and false and fraudulent pretenses, representations and promises,  
10 the monies, funds and assets owned by and under the control of Bank of America, a  
11 federally insured financial institution, for their own personal benefit and the benefit of their  
12 co-conspirators.

13 Manner and Means

14           3. The manner and means by which the objective of the conspiracy was  
15 accomplished include, but are not limited to, the following:

16           An unknown co-conspirator created counterfeit securities, that is checks, drawn  
17 against various corporate accounts at Bank of America and provided the counterfeit checks  
18 to Defendant **DORSEY**. Defendant **DORSEY** recruited and caused others to recruit  
19 defendants **ARMSTEAD, SPRATLEY, FLEMING, BROUSSARD**, and others known and  
20 unknown to the grand jury. Defendants **ARMSTEAD, SPRATLEY, FLEMING,**  
21 **BROUSSARD**, and others known and unknown to the grand jury, did pass and did attempt  
22 to pass counterfeit checks given to them by **DORSEY**, and by others on **DORSEY's** behalf,  
23 made payable to the defendants and their co-conspirators and drawn against various Bank  
24 of America account holders' corporate bank accounts. The defendants and their co-  
25 conspirators did not have lawful authority to access the Bank of America account holders'  
26 corporate bank accounts. After the defendants and their co-conspirators did fraudulently

1 negotiate counterfeit checks against Bank of America account holders' corporate bank  
 2 accounts, the defendants used the monies, funds, credits, assets, securities, and other  
 3 properties illegally obtained thereby for their own benefit and the benefit of their co-  
 4 conspirators.

5 Overt Acts

6 4. In furtherance of the conspiracy and to effect the objective of the  
 7 conspiracy, the defendants committed, and caused to be committed, the following overt acts,  
 8 among others:

9 a. On or about the below dates, defendants **DORSEY, ARMSTEAD,**  
 10 **SPRATLEY, FLEMING, BROUSSARD,** and other co-conspirators, aiding and abetting one  
 11 another, did make, utter and possess counterfeit securities, that is checks, made payable to  
 12 the defendants and their co-conspirators drawn against Bank of America account holders'  
 13 corporate bank accounts without the account holders' knowledge and permission. The  
 14 persons listed below then did negotiate and did attempt to negotiate said counterfeit checks  
 15 at various Bank of America branches in and around Las Vegas, Nevada, for the personal  
 16 benefit of the defendants and their co-conspirators.

| <u>Account Holder</u>     | <u>Date</u> | <u>Check No.</u> | <u>Amount</u> | <u>Person Negotiating</u> |
|---------------------------|-------------|------------------|---------------|---------------------------|
| SNA Construction Services | 1/12/05     | 55168            | \$996.32      | <b>NANCY FLEMING</b>      |
| SNA Construction Services | 1/12/05     | 55183            | \$2,398.24    | <b>DENISE SPRATLEY</b>    |
| Nasti Inc.                | 1/18/05     | 1677             | \$2,569.21    | <b>DENISE SPRATLEY</b>    |
| Nasti Inc.                | 1/18/05     | 1679             | \$2,483.20    | <b>NANCY FLEMING</b>      |
| American Band Accessories | 1/18/05     | 4918             | \$2,482.76    | <b>DENISE SPRATLEY</b>    |
| American Band Accessories | 1/18/05     | 4920             | \$2,390.08    | <b>NANCY FLEMING</b>      |
| Aspen Research            | 1/25/05     | 1701             | \$2,316.08    | <b>DENISE SPRATLEY</b>    |
| Aspen Research            | 1/25/05     | 1733             | \$2,287.04    | <b>NANCY FLEMING</b>      |

|    | <u>Account Holder</u>              | <u>Date</u> | <u>Check No.</u> | <u>Amount</u> | <u>Person Negotiating</u> |
|----|------------------------------------|-------------|------------------|---------------|---------------------------|
| 1  |                                    |             |                  |               |                           |
| 2  | Fisher Pen Company                 | 2/1/05      | 17303            | \$2,290.50    | DENISE SPRATLEY           |
| 3  | Fisher Pen Company                 | 2/1/05      | 17305            | \$2,075.00    | NANCY FLEMING             |
| 4  | Greater Foods                      | 2/7/05      | 9711             | \$2,362.60    | NANCY FLEMING             |
| 5  | Greater Foods                      | 2/9/05      | 9724             | \$2,281.20    | DENISE SPRATLEY           |
| 6  | The Gaul Group Inc                 | 2/23/05     | 3528             | \$2,049.22    | DENISE SPRATLEY           |
| 7  | Universal Merchant<br>Services Inc | 2/23/05     | 1092             | \$2,009.68    | DENISE SPRATLEY           |
| 8  |                                    |             |                  |               |                           |
| 9  | Worden's Insurance<br>Agency       | 3/21/05     | 28665            | \$1,954.05    | DENISE SPRATLEY           |
| 10 | Alliance Estate<br>Planning Inc.   | 2/21/05     | 1968             | \$2,260.25    | DENISE SPRATLEY           |
| 11 |                                    |             |                  |               |                           |
| 12 | Casino Concepts<br>& Design        | 3/28/05     | 2110             | \$2,152.01    | DENISE SPRATLEY           |
| 13 |                                    |             |                  |               |                           |
| 14 | Relocation Mgmt<br>Resources Inc   | 4/4/05      | 14502            | \$2,213.16    | DENISE SPRATLEY           |
| 15 |                                    |             |                  |               |                           |
| 16 | Carson Valley<br>Precision LLC     | 4/11/05     | 4464             | \$2,365.90    | DENISE SPRATLEY           |
| 17 | Bentley Holdings<br>California LP  | 4/15/05     | 3615             | \$2,218.78    | DENISE SPRATLEY           |
| 18 |                                    |             |                  |               |                           |
| 19 | Metric Motors Ltd                  | 6/9/05      | 14580            | \$2,281.48    | DENISE SPRATLEY           |
| 20 | Health First<br>Technologies Inc   | 6/9/05      | 71032            | \$2,419.43    | DENISE SPRATLEY           |
| 21 |                                    |             |                  |               |                           |
| 22 | Fernley Truck Inn Inc              | 6/10/05     | 20919            | \$2,348.65    | DENISE SPRATLEY           |
| 23 | Yorke Equipment<br>Company         | 6/24/05     | 11214            | \$2,411.07    | NAOMI BROUSSARD           |
| 24 |                                    |             |                  |               |                           |
| 25 | Southwest Strategies<br>Inc        | 6/27/05     | 4400             | \$4,378.96    | NAOMI BROUSSARD           |
| 26 |                                    |             |                  |               |                           |

| <u>Account Holder</u>  | <u>Date</u> | <u>Check No.</u> | <u>Amount</u> | <u>Person Negotiating</u> |
|------------------------|-------------|------------------|---------------|---------------------------|
| E & R Electric         | 6/27/05     | 10070            | \$4,251.06    | NAOMI BROUSSARD           |
| Marquis Management Inc | 7/25/05     | 1503             | \$2,214.30    | TERRY ARMSTEAD            |

All in violation of Title 18, United States Code, Section 371.

### COUNTS TWO THROUGH TWENTY-EIGHT

#### Bank Fraud

1. The factual allegations of Count One of this Indictment are incorporated by reference.
2. On or about the below dates, in the State and Federal District of Nevada and elsewhere,

**TERRY J. ARMSTEAD,  
DENISE DORSEY, aka JOZEE RILEY, and  
DENISE SPRATLEY,  
NANCY FLEMING, and  
NAOMI BROUSSARD,**

defendants, herein, and others known and unknown to the Grand Jury, did knowingly and with intent to defraud, devise and execute a scheme and artifice to defraud Bank of America, a federally insured financial institution, as to a material matter, and a scheme and artifice to obtain monies, funds credits, assets, securities and other property owned by and under the custody and control of Bank of America by means of material false and fraudulent pretenses, representations, and promises, and the concealment of material facts, with each unauthorized negotiation and attempted negotiation set forth below constituting a separate violation of Title 18, United States Code, Sections 1344 and 2.

| <u>Count</u> | <u>Account Holder</u>     | <u>Date</u> | <u>Amount</u> | <u>Negotiator</u> |
|--------------|---------------------------|-------------|---------------|-------------------|
| TWO          | SNA Construction Services | 1/12/05     | \$996.32      | FLEMING           |
| THREE        | SNA Construction Services | 1/12/05     | \$2,398.24    | SPRATLEY          |
| FOUR         | Nasti Inc.                | 1/18/05     | \$2,569.21    | SPRATLEY          |



| <u>Count</u> | <u>Account Holder</u>           | <u>Date</u> | <u>Amount</u> | <u>Negotiator</u> |
|--------------|---------------------------------|-------------|---------------|-------------------|
| FIVE         | Nasti Inc.                      | 1/18/05     | \$2,483.20    | FLEMING           |
| SIX          | American Band Accessories       | 1/18/05     | \$2,482.76    | SPRATLEY          |
| SEVEN        | American Band Accessories       | 1/18/05     | \$2,390.08    | FLEMING           |
| EIGHT        | Aspen Research                  | 1/25/05     | \$2,316.08    | SPRATLEY          |
| NINE         | Aspen Research                  | 1/25/05     | \$2,287.04    | FLEMING           |
| TEN          | Fisher Pen Company              | 2/1/05      | \$2,290.50    | SPRATLEY          |
| ELEVEN       | Fisher Pen Company              | 2/1/05      | \$2,075.00    | FLEMING           |
| TWELVE       | Greater Foods                   | 2/7/05      | \$2,362.60    | FLEMING           |
| THIRTEEN     | Greater Foods                   | 2/9/05      | \$2,281.20    | SPRATLEY          |
| FOURTEEN     | The Gaul Group Inc              | 2/23/05     | \$2,049.22    | SPRATLEY          |
| FIFTEEN      | Universal Merchant Services Inc | 2/23/05     | \$2,009.68    | SPRATLEY          |
| SIXTEEN      | Worden's Insurance Agency       | 3/21/05     | \$1,954.05    | SPRATLEY          |
| SEVENTEEN    | Alliance Estate Planning Inc.   | 2/21/05     | \$2,260.25    | SPRATLEY          |
| EIGHTEEN     | Casino Concepts & Design        | 3/28/05     | \$2,152.01    | SPRATLEY          |
| NINETEEN     | Relocation Mgmt Resources Inc   | 4/4/05      | \$2,213.16    | SPRATLEY          |
| TWENTY       | Carson Valley Precision LLC     | 4/11/05     | \$2,365.90    | SPRATLEY          |
| TWENTY ONE   | Bentley Holdings California LP  | 4/15/05     | \$2,218.78    | SPRATLEY          |
| TWENTY TWO   | Metric Motors Ltd               | 6/9/05      | \$2,281.48    | SPRATLEY          |
| TWENTY THREE | Health First Technologies Inc   | 6/9/05      | \$2,419.43    | SPRATLEY          |

|    |              |                             |         |            |                  |
|----|--------------|-----------------------------|---------|------------|------------------|
| 1  | TWENTY FOUR  | Fernley Truck Inn Inc       | 6/10/05 | \$2,348.65 | <b>SPRATLEY</b>  |
| 2  | TWENTY FIVE  | Yorke Equipment<br>Company  | 6/24/05 | \$2,411.07 | <b>BROUSSARD</b> |
| 3  | TWENTY SIX   | Southwest Strategies<br>Inc | 6/27/05 | \$4,378.96 | <b>BROUSSARD</b> |
| 4  |              |                             |         |            |                  |
| 5  | TWENTY SEVEN | E & R Electric              | 6/27/05 | \$4,251.06 | <b>BROUSSARD</b> |
| 6  | TWENTY EIGHT | Marquis Management Inc      | 7/25/05 | \$2,214.30 | <b>ARMSTEAD</b>  |
| 7  | . . .        |                             |         |            |                  |
| 8  | . . .        |                             |         |            |                  |
| 9  | . . .        |                             |         |            |                  |
| 10 | . . .        |                             |         |            |                  |
| 11 | . . .        |                             |         |            |                  |
| 12 | . . .        |                             |         |            |                  |
| 13 | . . .        |                             |         |            |                  |
| 14 | . . .        |                             |         |            |                  |
| 15 | . . .        |                             |         |            |                  |
| 16 | . . .        |                             |         |            |                  |
| 17 | . . .        |                             |         |            |                  |
| 18 | . . .        |                             |         |            |                  |
| 19 | . . .        |                             |         |            |                  |
| 20 | . . .        |                             |         |            |                  |
| 21 | . . .        |                             |         |            |                  |
| 22 | . . .        |                             |         |            |                  |
| 23 | . . .        |                             |         |            |                  |
| 24 | . . .        |                             |         |            |                  |
| 25 | . . .        |                             |         |            |                  |
| 26 | . . .        |                             |         |            |                  |



**FORFEITURE ALLEGATION ONE**  
Conspiracy

1. The allegation of Count One of this Superseding Criminal Indictment is hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to the provision of Title 18, United States Code, Section 982(a)(2)(A).

2. Upon a conviction of the felony offense charged in Count One of this Superseding Criminal Indictment,

**TERRY J. ARMSTEAD,  
DENISE DORSEY, a.k.a. JOZEE RILEY,  
DENISE SPRATLEY,  
NANCY FLEMING, and  
NAOMI BROUSSARD**

defendants herein, shall forfeit to the United States of America, any property constituting, or derived from, proceeds obtained directly or indirectly, as the result of a conspiracy to commit violations of Title 18 United States Code, Section 1344, up to \$64,460.23, including, but not limited to:

a. 2000 SILVER LINCOLN NAVIGATOR, NEVADA LICENSE PLATE NUMBER LV 478 SSD, VIN 5LMEU27A3YLJ21628, TITLED IN THE NAME OF TERRY ARMSTEAD, REGISTERED IN THE NAME OF TERRY ARMSTEAD.

b. 1998 PORSCHE BOXSTER CONVERTIBLE, ARIZONA LICENSE PLATE 260 PNS, VIN WPOCA2981WU621523, TITLED IN THE NAME OF GENERAL MOTORS ACCEPTANCE, REGISTERED IN THE NAME OF NIKKI LEAN ROBINSON.

3. If any property being subject to forfeiture pursuant to Title 18, United States Code, Section 982(a)(2)(A), as a result of any act or omission of the defendants –

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been place beyond the jurisdiction of the court;
- d. has been substantially diminished in value, or;
- e. has been commingled with other property that cannot be divided without difficulty;

it is the intent of the United States of America to seek forfeiture of any properties of the defencant up to \$64,460.23.

All pursuant to Title 18, United States Code, Sections 982(a)(2)(A) and 982(b), and Title 21, United States Code, Section 853(p).

**FORFEITURE ALLEGATION TWO**  
Conspiracy

1. The allegation of Count One of this Superseding Criminal Indictment is hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to the provision of Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

2. Upon a conviction of the felony offense charged in Count One of this Superseding Criminal Indictment,

**TERRY J. ARMSTEAD,  
DENISE DORSEY, a.k.a. JOZEE RILEY,  
DENISE SPRATLEY,  
NANCY FLEMING, and  
NAOMI BROUSSARD**

defendants herein, shall forfeit to the United States of America, any property, real or personal, which constitutes, or is derived from, proceeds traceable to violations of Title 18 United States Code, Section 513(a), a "specified unlawful activity" as defined in 18 U.S.C. §1956(c)(7)(D), or a conspiracy to commit such offenses up to \$64,460.23, including, but not limited to:

1 a. 2000 SILVER LINCOLN NAVIGATOR, NEVADA LICENSE  
2 PLATE NUMBER LV 478 SSD, VIN 5LMEU27A3YLJ21628,  
3 TITLED IN THE NAME OF TERRY ARMSTEAD, REGISTERED  
4 IN THE NAME OF TERRY ARMSTEAD.

5 b. 1998 PORSCHE BOXSTER CONVERTIBLE, ARIZONA  
6 LICENSE PLATE 260 PNS, VIN WP0CA2981WU621523,  
7 TITLED IN THE NAME OF GENERAL MOTORS  
8 ACCEPTANCE, REGISTERED IN THE NAME OF NIKKI LEAN  
9 ROBINSON.

10 3. If any property being subject to forfeiture pursuant to Title 18, United  
11 States Code, Section 981(a)(1)(C) and 28, United States Code, Section 2461(c), as a  
12 result of any act or omission of the defendants –

- 13 a. cannot be located upon the exercise of due diligence;
- 14 b. has been transferred or sold to, or deposited with, a third party;
- 15 c. has been place beyond the jurisdiction of the court;
- 16 d. has been substantially diminished in value, or;
- 17 e. has been commingled with other property that cannot be divided  
18 without difficulty;

19 it is the intent of the United States of America to seek forfeiture of any properties of the  
20 defendant up to \$64,460.23.

21 All pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and  
22 Title 28, United States Code, Section 2461(c) and Title 21, United States Code, Section  
23 853(p).

24 . . .

25 . . .

26 . . .

**FORFEITURE ALLEGATION THREE**

Bank

1  
2  
3           1.     The allegation of Counts Two through Twenty Eight of this  
4 Superseding Criminal Indictment are hereby realleged and incorporated herein by  
5 reference for the purpose of alleging forfeiture pursuant to the provision of Title 18,  
6 United States Code, Section 982(a)(2)(A).

7           2.     Upon a conviction of the felony offense charged in Count Two  
8 through Count Twenty Eight of this Superseding Criminal Indictment,

9                               **TERRY J. ARMSTEAD,**  
10                               **DENISE SPRATLEY,**  
11                               **NANCY FLEMING, and**  
                              **NAOMI BROUSSARD,**

12 defendants herein, shall forfeit to the United States of America, any property  
13 constituting, or derived from, proceeds obtained directly or indirectly, as the result of  
14 a violation of Title 18 United States Code, Section 1344, up to \$64,460.23.

15           3.     If any property being subject to forfeiture pursuant to Title 18, United  
16 States Code, Section 982(a)(2)(A), as a result of any act or omission of the defendants –

- 17                   a.     cannot be located upon the exercise of due diligence;  
18                   b.     has been transferred or sold to, or deposited with, a third party;  
19                   c.     has been place beyond the jurisdiction of the court;  
20                   d.     has been substantially diminished in value, or;  
21                   e.     has been commingled with other property that cannot be divided  
22                               without difficulty;

23 it is the intent of the United States of America to seek forfeiture of any properties of the  
24 defencant up to \$64,460.23.

25 . . . .

26 . . . .


1 All pursuant to Title 18, United States Code, Sections 982(a)(2)(A) and 982(b)  
2 and Title 21, United States Code, Section 853(p).

3 **DATED:** this 27 day of February 2007.

4 **A TRUE BILL:**

5 \_\_\_\_\_  
6 /S/  
7 FOREPERSON OF THE GRAND JURY

8 DANIEL G. BOGDEN  
9 United States Attorney

10   
11 KIMBERLY M. FRAYN  
12 Assistant United States Attorney